

Exhibit J

Chantelle D'Angelo

From: Dmitry Lev, Esq. <dlev@levlaw.net>
Sent: Thursday, July 02, 2015 1:48 PM
To: Chantelle D'Angelo
Subject: Re: Niles matter
Attachments: Niles S Wakefield b.pdf; Niles S Wakefield m.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Attached please find the medical and billing records from Wakefield Physical Therapy. Lahey Clinic has not provided 178 pages of ER, hospitalization, and treatment records because there is a dispute regarding the prepayment for their copying service. Accordingly, the Lahey records are not - nor have ever been - without my care, custody, or control.

Please let me know if you need anything else.

Very truly yours,

Dmitry Lev, Esq.
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On Thu, Jul 2, 2015 at 1:42 PM, Chantelle D'Angelo <cDAngelo@lccplaw.com> wrote:

> Attorney Lev,

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> As a follow-up to our telephone conversation today, I want to
> reiterate that I need a definite timeframe on the outstanding
> medicals. You have previously indicated that these two providers had
> treated the Plaintiff's alleged injuries after the incident, yet we
> have not received any such records. We originally sent Requests for
> Production of Documents back on July 31, 2014. Since that time, you
> have repeatedly assured me the medicals were going to be produced and
> we have not received anything. Discovery closed almost a month ago.

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> If you cannot give me a definite date to have the medicals in hand by
> next Tuesday, I will be filing a Motion to Compel their production
> with the Court, along with costs and attorney's fees related to that motion.

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